IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Regina M. Dreher aka Regina Marie Helen Dreher aka Regina Dreher Debtor(s) BK NO. 18-03124 MJC

Chapter 13

PennyMac Loan Services, LLC

Movant

VS.

Regina M. Dreher aka Regina Marie Helen Dreher aka Regina Dreher

Debtor(s)

Jack N. Zaharopoulos

Trustee

PENNYMAC LOAN SERVICES, LLC'S NOTICE OF DEBTOR'S REQUEST FOR FORBEARANCE DUE TO THE COVID-19 PANDEMIC

Now comes Creditor PennyMac Loan Services, LLC ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 2 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 02/01/2022 through 03/31/2022. Creditor holds a secured interest in real property commonly known as 312 North 3rd Street Lehighton, PA 18235 as evidenced by claim number 10 on the Court's claim register. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 04/01/2022

and will be required to cure the delinquency created by the forbearance period

(hereinafter "forbearance arrears"). Creditor has retained undersigned counsel to seek an

agreement with Debtor regarding the cure of the forbearance arrears and submit that

agreement to the Court for approval. If Debtor fails to make arrangements to fully cure

the forbearance arrears, Creditor reserves it rights to seek relief from the automatic stay

upon expiration of the forbearance period.

Respectfully Submitted,

/s/<u>Rebecca A. Solarz, Esquire</u>

Rebecca A. Solarz, Esquire *Attorney for Creditor*